

December 23, 2009

Mr. Daniel R. Wilkus, P.E.
Manager, Air and Water Programs
Westar Energy
818 S Kansas Avenue
PO Box 889
Topeka, Kansas 66601

RE: Jeffery Energy Center - NSPS Subpart D Alternative Opacity Monitoring Plan

Dan,

Thank you for working with Eric Sturm of our office to come to an agreement for your proposed Alternative Opacity Monitoring Plan for NSPS Subpart D. EPA Region VII has reviewed the proposed plan and its attachments. The proposed plan meets all the necessary requirements for alternative monitoring, and EPA Region VII approves the proposed Alternative Opacity Monitoring Plan for NSPS Subpart D for Jeffery Energy Center Units 1, 2 and 3 given the following key elements will be met:

- Westar will record and maintain 6-minute and 1-hour L/G (liquid to gas ratio) averages in addition to the 3-hour block L/G averages for each Unit.
- Westar will conduct weekly Qualitative Assessments of opacity for each unit.
- Westar will Qualitative Assessment of opacity for each excursion as defined in the plan within 24-hours, except as noted in the plan.
- Westar will establish an upper excursion L/G threshold of **0.0030** across all load ranges for all three units. The lower excursion threshold of **0.00080** across all load ranges will remain unchanged as well as excluding periods of startup, shutdown and malfunction.

Please note that the upper and lower L/G thresholds are specified to two significant figures. If you have any questions please contact Eric Sturm at 913.551.7377 or sturm.eric@epamail.epa.gov.

Sincerely,

Mark A. Smith,
Branch Chief,
Air Permitting and Compliance,
USEPA Region 7

Cc: Rick Bolfig, KDHE
Lynette Bayless, KDHE